

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 27, 2009

Name of company(s) covered by this certification: China Telecom (Americas) Corporation

Form 499 Filer ID: 822646

Name of signatory: Ling-Ping Kong

Title of signatory: Vice President

I, Ling-Ping Kong, certify that I am an officer of the China Telecom (Americas) Corporation (the "Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

  
Ling-Ping Kong

China Telecom (Americas) Corporation  
中國電信 (美洲) 公司

Headquarters  
607 Herndon Parkway, Suite 201  
Herndon, VA 20170 USA  
Tel: 703-787-0088 Fax: 703-787-0086

## Customer Proprietary Network Information Certification Attachment A

China Telecom (Americas) Corporation has put in place a program to ensure compliance with the FCC's requirement to protect customer proprietary network information ("CPNI"). This program is supervised by the Director for Administration who is responsible for implementation and approval of all uses of CPNI.

The Director for Administration has established:

- A mechanism to provide customers with notification of their CPNI rights, and China Telecom's obligations, prior to soliciting customers for approval to use, disclose, or allow access to CPNI
- A mechanism to obtain prior customer approval, either opt-out or opt-in, to use, disclose, or allow access to CPNI in accordance with the Commission's notification and opt-in/opt-out rules, *see e.g.*, 47 C.F.R. § 64.2008(b)
- A record-keeping system to determine the customer's decision regarding use of CPNI, any marketing and sales campaign using CPNI and all instances of when CPNI was disclosed or provided to third parties
- A supervisory review process for any outbound marketing that uses CPNI
- A disciplinary procedure for improper use of CPNI by employees, agents and contractors
- A training mechanism to ensure that all employees, agents and contractors are aware of when they can use CPNI in sales and marketing
- A standard contract provision for enterprise customers regarding use of CPNI
- Procedures to ensure customers are authenticated in accordance with the Commission's rules for passwords and back-up authentication procedures prior to providing call detail information during customer-initiated telephone inquiries or online access
- Procedures to notify customers immediately of any changes to account information regarding passwords, back-up authentication questions, or the address of record
- Procedures to notify the appropriate law enforcement agencies and customers in accordance with the Commission's notification timetables, 47 C.F.R. § 2011